

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHOT EGIAZARYAN	:	
	:	
v.	:	Case No. 1:11-cv-02670 (PKC)
	:	
PETER ZALMAYEV	:	
	:	

Peter Zalmayev's Planned Depositions

For November 8, 2011, Conference

This is a summary of Peter Zalmayev's planned depositions now, pursuant to the Court's November 3, 2011, Order. Since so little discovery from Egiazaryan has occurred to date, Zalmayev expects that Egiazaryan's documents and these depositions to be taken will lead to other depositions and discovery. For witnesses other than the main ones, we have listed the likely subjects, but it is expected that the questioning inevitably follow the answers and the scope of the deposition could be broader or narrower.

DEPONENT or HOLDER OF DOCUMENTS	SUBJECTS OF TESTIMONY	TOPICS OF DOCUMENTS REQUESTED FROM NON-PARTIES
Ashot Egiazaryan Plaintiff	Defamation LDPR affiliation, complaint ¶2, 28, 37, 49, 57 LDPR support, especially financial ¶2 anti-Semitism ¶2, 36, 38, 46-48 anti-American ¶2, 36 Egiazaryan is corrupt ¶2 Zhirinovsky colleague ¶2, 39 Chechnya embezzlement ¶2, 56, 59 Duma activities ¶2 Egiazaryan's or agents' contact with letter writers Public Figure	

	<p>Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice</p> <p>Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages</p> <p>Egiazaryan reputation and conduct</p> <p>Honorable or corrupt politician</p> <p>Honorable or corrupt businessman</p> <p>Philanthropy</p> <p>Return to Russia/asylum application, ¶99</p> <p>Harm to his business/his finances ¶1, 3, 89</p> <p>Risk of personal harm to Ashot and family ¶1, 3</p> <p>Public relations and lobbying activity</p> <p>Public relations and lobbying expenses due to Zalmayev, ¶89</p> <p>Criminal charges</p> <p>Use of "fronts" to hide involvement in businesses and money laundering.</p> <p>Credibility</p> <p>Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim</p> <p>Whether good faith suit for damages</p> <p>Support for allegation that Zalmayev connected to:</p> <p>Kerimov</p> <p>Moskva Hotel dispute</p> <p>Criminal charges</p> <p>Corporate raid, ¶1, 10</p> <p>Conspiracy to commit murder, ¶17</p> <p>Is central figure in conspiracy, ¶5</p> <p>Working with corrupt Russian figures, ¶18</p> <p>Dissemination of complaint</p> <p>Statements to others</p>	
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<p>Artem Egiazaryan</p> <p>Brother/business partner</p>	<p>Defamation LDPR affiliation, complaint ¶2, 28, 37, 49, 57 LDPR support, especially financial ¶2 anti-Semitism ¶2, 36, 38, 46-48 anti-American ¶2, 36 Egiazaryan is corrupt ¶2 Zhirinovsky colleague ¶2, 39 Chechnya embezzlement ¶2, 56, 59 Duma activities ¶2 Egiazaryan's or agents' contact with letter writers</p> <p>Public Figure Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Return to Russia/asylum application, ¶99 Harm to his business/his finances ¶1, 3, 89 Risk of personal harm to Ashot and family ¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev, ¶89 Criminal charges Artem and Suren's knowledge of relevant information and involvement with Ashot's activities, including acting as his "front" and money laundering.</p> <p>Credibility Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim</p>	<p>Documents concerning:</p> <p>LDPR affiliation LDPR support Witness or others handling Ashot's businesses and money and property Ashot's asylum application Communications about Zalmayev by Ashot and his agents Preparation and dissemination of the complaint Ashot's public relations and lobbying campaign Duma vote to eliminate immunity Published materials about Ashot Hotel Moskva dispute Criminal charges and investigations against Ashot, Artem and Suren 1999 prostitution sting United States tax filings by Ashot, Artem and Suren</p>
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	<p>Whether good faith suit for damages</p> <p>Support for allegation that Zalmayev connected to:</p> <ul style="list-style-type: none"> Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18 <p>Dissemination of complaint</p> <p>Statements to others</p>	
<p>Suren Egiazaryan</p> <p>Brother or cousin/business partner</p>	<p>Defamation</p> <p>LDPR affiliation, complaint ¶2, 28, 37, 49, 57</p> <p>LDPR support, especially financial ¶2</p> <p>anti-Semitism ¶2, 36, 38, 46-48</p> <p>anti-American ¶2, 36</p> <p>Egiazaryan is corrupt ¶2</p> <p>Zhirinovsky colleague ¶2, 39</p> <p>Chechnya embezzlement ¶2, 56, 59</p> <p>Duma activities ¶2</p> <p>Egiazaryan's or agents' contact with letter writers</p> <p>Public Figure</p> <p>Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice</p> <p>Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages</p> <p>Egiazaryan reputation and conduct</p> <ul style="list-style-type: none"> Honorable or corrupt politician Honorable or corrupt businessman Philanthropy <p>Return to Russia/asylum application, ¶99</p> <p>Harm to his business/his finances</p>	<p>Documents concerning:</p> <p>LDPR affiliation</p> <p>LDPR support</p> <p>Witness or others handling Ashot's businesses and money and property</p> <p>Ashot's asylum application</p> <p>Communications about Zalmayev by Ashot and his agents</p> <p>Preparation and dissemination of the complaint</p> <p>Ashot's public relations and lobbying campaign</p> <p>Duma vote to eliminate immunity</p> <p>Published materials about Ashot</p> <p>Hotel Moskva dispute</p> <p>Criminal charges and investigations against Ashot, Artem and Suren</p> <p>1999 prostitution sting</p> <p>United States tax filings by Ashot, Artem and Suren</p>

	<p>¶1, 3, 89 Risk of personal harm to Ashot and family ¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev, ¶89 Criminal charges Artem and Suren's knowledge of relevant information and involvement with Ashot's activities, including acting as his "front" and money laundering.</p> <p>Credibility Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim Whether good faith suit for damages Support for allegation that Zalmayev connected to: Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18 Dissemination of complaint Statements to others</p>	
<p>John Lough</p> <p>Public relations and lobbying</p>	<p>Defamation LDPR affiliation, complaint ¶2, 28, 37, 49, 57 LDPR support, especially financial ¶2 anti-Semitism ¶2, 36, 38, 46-48 anti-American ¶2, 36 Egiazaryan is corrupt ¶2 Zhirinovsky colleague ¶2, 39 Chechnya embezzlement ¶2, 56, 59 Duma activities ¶2 Egiazaryan's or agents' contact with letter writers</p>	<p>Documents concerning:</p> <p>Ashot Egiazaryan Public relations and lobbying Communications about Zalmayev by Ashot and his agents Preparation and dissemination of the complaint Website creation Internet activities Peter Zalmayev Contract, invoices and payments</p>

	<p>Public Figure Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Return to Russia/asylum application, ¶99 Harm to his business/his finances ¶1, 3, 89 Use of "fronts" to hide involvement in businesses and money laundering. Risk of personal harm to Ashot and family ¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev, ¶89 Criminal charges Creation of back-dated \$20,000,000 note</p> <p>Credibility Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim Whether good faith suit for damages Support for allegation that Zalmayev connected to: Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18</p>	
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	Dissemination of complaint Statements to others	
Walker Roberts Public relations and lobbying	Defamation LDPR affiliation, complaint ¶2, 28, 37, 49, 57 LDPR support, especially financial ¶2 anti-Semitism ¶2, 36, 38, 46-48 anti-American ¶2, 36 Egiazaryan is corrupt ¶2 Zhirinovsky colleague ¶2, 39 Chechnya embezzlement ¶2, 56, 59 Duma activities ¶2 Egiazaryan's or agents' contact with letter writers Public Figure Egiazaryan's activities that make him public, ¶82 Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation. Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Return to Russia/asylum application, ¶99 Harm to his business/his finances ¶1, 3, 89 Use of "fronts" to hide involvement in businesses and money laundering. Risk of personal harm to Ashot and family ¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev, ¶89 Criminal charges Creation of back-dated \$20,000,000 note Credibility	Documents concerning: Ashot Egiazaryan Public relations and lobbying Communications about Zalmayev by Ashot and his agents Preparation and dissemination of the complaint Website creation Internet activities Peter Zalmayev Contract, invoices and payments

	<p>Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim</p> <p>Whether good faith suit for damages</p> <p>Support for allegation that Zalmayev connected to:</p> <ul style="list-style-type: none"> Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18 <p>Dissemination of complaint</p> <p>Statements to others</p>	
<p>Drew Holiner</p> <p>Egiazaryan lawyer</p>	<p>Defamation</p> <p>LDPR affiliation, complaint ¶2, 28, 37, 49, 57</p> <p>LDPR support, especially financial ¶2</p> <p>anti-Semitism ¶2, 36, 38, 46-48</p> <p>anti-American ¶2, 36</p> <p>Egiazaryan is corrupt ¶2</p> <p>Zhirinovsky colleague ¶2, 39</p> <p>Chechnya embezzlement ¶2, 56, 59</p> <p>Duma activities ¶2</p> <p>Egiazaryan's or agents' contact with letter writers</p> <p>Public Figure</p> <p>Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice</p> <p>Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages</p> <p>Egiazaryan reputation and conduct</p> <ul style="list-style-type: none"> Honorable or corrupt politician Honorable or corrupt businessman Philanthropy 	<p>Documents not subject to the attorney client privilege concerning:</p> <p>Ashot Egiazaryan</p> <p>Public relations and lobbying</p> <p>Communications about Zalmayev by Ashot and his agents</p> <p>Preparation and dissemination of the complaint</p> <p>Website creation</p> <p>Internet activities</p> <p>Peter Zalmayev</p> <p>Contract, invoices and payments</p>

	<p>Return to Russia/asylum application, ¶¶99</p> <p>Harm to his business/his finances ¶¶1, 3, 89</p> <p>Risk of personal harm to Ashot and family ¶¶1, 3</p> <p>Public relations and lobbying activity</p> <p>Public relations and lobbying expenses due to Zalmayev, ¶¶89</p> <p>Criminal charges</p> <p>Use of “fronts” to hide involvement in businesses and money laundering.</p> <p>Credibility</p> <p>Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim</p> <p>Whether good faith suit for damages</p> <p>Support for allegation that Zalmayev connected to:</p> <ul style="list-style-type: none"> Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶¶1, 10 Conspiracy to commit murder, ¶¶17 Is central figure in conspiracy, ¶¶5 Working with corrupt Russian figures, ¶¶18 <p>Dissemination of complaint</p> <p>Statements to others</p>	
<p>Alan Platt</p> <p>Public relations and lobbying</p>	<p>Defamation</p> <p>LDPR affiliation, complaint ¶¶2, 28, 37, 49, 57</p> <p>LDPR support, especially financial ¶¶2</p> <p>anti-Semitism ¶¶2, 36, 38, 46-48</p> <p>anti-American ¶¶2, 36</p> <p>Egiazaryan is corrupt ¶¶2</p> <p>Zhirinovsky colleague ¶¶2, 39</p> <p>Chechnya embezzlement ¶¶2, 56, 59</p> <p>Duma activities ¶¶2</p> <p>Egiazaryan’s or agents’ contact</p>	<p>Documents concerning:</p> <p>Ashot Egiazaryan</p> <p>Public relations and lobbying</p> <p>Communications about Zalmayev by Ashot and his agents</p> <p>Preparation and dissemination of the complaint</p> <p>Website creation</p> <p>Internet activities</p> <p>Peter Zalmayev</p> <p>Contract, invoices and payments</p>

	<p>with letter writers</p> <p>Public Figure Egiazaryan's activities that make him public, ¶82</p> <p>Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Return to Russia/asylum application, ¶99 Harm to his business/his finances ¶1, 3, 89 Risk of personal harm to Ashot and family ¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev Criminal charges Use of "fronts" to hide involvement in businesses and money laundering.</p> <p>Credibility Reputation for and actual honesty or dishonesty.</p> <p>Counterclaim Whether good faith suit for damages Support for allegation that Zalmayev connected to: Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18 Dissemination of complaint</p>	
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	Statements to others	
Laurence Shore Public relations and lobbying	Defamation LDPR affiliation, complaint ¶¶2, 28, 37, 49, 57 LDPR support, especially financial ¶¶2 anti-Semitism ¶¶2, 36, 38, 46-48 anti-American ¶¶2, 36 Egiazaryan is corrupt ¶¶2 Zhirinovsky colleague ¶¶2, 39 Chechnya embezzlement ¶¶2, 56, 59 Duma activities ¶¶2 Egiazaryan's or agents' contact with letter writers Public Figure Egiazaryan's activities that make him public, ¶¶82 Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation. Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Return to Russia/asylum application, ¶¶99 Harm to his business/his finances ¶¶1, 3, 89 Risk of personal harm to Ashot and family ¶¶1, 3 Public relations and lobbying activity Public relations and lobbying expenses due to Zalmayev Criminal charges Use of "fronts" to hide involvement in businesses and money laundering. Credibility Reputation for and actual honesty or dishonesty. Counterclaim	Documents concerning: Ashot Egiazaryan Public relations and lobbying Communications about Zalmayev by Ashot and his agents Preparation and dissemination of the complaint Website creation Internet activities Peter Zalmayev Contract, invoices and payments

	<p>Whether good faith suit for damages</p> <p>Support for allegation that Zalmayev connected to:</p> <ul style="list-style-type: none"> Kerimov Moskva Hotel dispute Criminal charges Corporate raid, ¶1, 10 Conspiracy to commit murder, ¶17 Is central figure in conspiracy, ¶5 Working with corrupt Russian figures, ¶18 <p>Dissemination of complaint</p> <p>Statements to others</p>	
<p>Sergei Ponomarev</p> <p>Handles Egiazaryan money in US</p>	<p>Defamation</p> <p>LDPR affiliation, complaint ¶2, 28, 37, 49, 57</p> <p>LDPR support, especially financial ¶2</p> <p>Egiazaryan is corrupt ¶2</p> <p>Zhirinovsky colleague ¶2, 39</p> <p>Chechnya embezzlement ¶2, 56, 59</p> <p>Actual Malice</p> <p>Egiazaryan's prior similar acts to the subjects of the alleged defamation.</p> <p>Damages</p> <p>Egiazaryan reputation and conduct</p> <ul style="list-style-type: none"> Honorable or corrupt politician Honorable or corrupt businessman Philanthropy <p>Harm to his business/his finances ¶1, 3, 89</p> <p>Criminal charges</p> <p>Artem and Suren's knowledge of relevant information and involvement with Ashot's activities, including acting as his "front" and money laundering.</p> <p>Use of "fronts" to hide involvement in businesses and money laundering.</p>	<p>Documents concerning:</p> <ul style="list-style-type: none"> Financial records concerning Ashot's money Money transfers for Ashot Creation of back-dated \$20,000,000 note Corporate records of companies used by or for Ashot Public relations and lobbying, especially payment Asylum

	Credibility Reputation for and actual honesty or dishonesty.	
Andrey Gloriozov Handles Egiazaryan money in Luxembourg and elsewhere	Defamation LDPR affiliation, complaint ¶¶2, 28, 37, 49, 57 LDPR support, especially financial ¶¶2 Egiazaryan is corrupt ¶¶2 Zhirinovsky colleague ¶¶2, 39 Chechnya embezzlement ¶¶2, 56, 59 Actual Malice Egiazaryan's prior similar acts to the subjects of the alleged defamation. Damages Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy Harm to his business/his finances ¶¶1, 3, 89 Criminal charges Artem and Suren's knowledge of relevant information and involvement with Ashot's activities, including acting as his "front" and money laundering. Use of "fronts" to hide involvement in businesses and money laundering. Credibility Reputation for and actual honesty or dishonesty.	Documents concerning: Financial records concerning Ashot's money Money transfers for Ashot Creation of back-dated \$20,000,000 note Corporate records of companies used by or for Ashot Public relations and lobbying, especially payment Asylum
Svetlana Gannushkina Human rights activist/letter writer	Circumstances of letter she wrote criticizing Egiazaryan, creation of declaration declaring that such letter was a forgery, and her retraction of the declaration	Documents concerning: Communications from Egiazaryan or his agents Communications about Zalmayev
Aleksey Mitrofanov Former LDPR official	Egiazaryan's LDPR affiliation Egiazaryan's LDPR financial and other support	

	Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy	
Dmitrii Garushka Egiazaryan business partner	Egiazaryan's LDPR affiliation Egiazaryan's LDPR financial and other support Egiazaryan reputation and conduct Honorable or corrupt politician Honorable or corrupt businessman Philanthropy	
Lev Ponomarev Human rights activities and letter writer	Communications from Egiazaryan or his agents Communications about Zalmayev	Documents concerning: Communications from Egiazaryan or his agents Communications about Zalmayev
Lyudmila Alexeyeva Human rights activities and letter writer	Communications from Egiazaryan or his agents Communications about Zalmayev	Documents concerning: Communications from Egiazaryan or his agents Communications about Zalmayev
BGR Group Public relations and lobbying	Witnesses are: John Lough Walker Roberts Jeffrey Birnbaum (deposed)	Ashot Egiazaryan Public relations and lobbying Communications about Zalmayev by Ashot and his agents Preparation and dissemination of the complaint Website creation Internet activities Peter Zalmayev Contract, invoices and payments
Bank of America	No witness unless authentication is needed	Documents concerning: Financial records concerning Ashot's money Money transfers for Ashot Corporate records of companies used by or for Ashot Public relations and lobbying, especially payment

/s/ Andrew J Ryan

Andrew J. Ryan

Matthew P. Feser

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Dated: November 7, 2011